

1 Q And you'll see that Janice Crouch wasn't even at this
2 meeting.

3 A Right.

4 Q Now, if you go down to the bottom of page 2 and
5 continue on through page 3 and page 4, you'll see a listing of
6 officers for the various companies.

7 A That's true.

8 Q And you'll notice that Jane Duff appears as a vice
9 president of most of the companies in question. Not
10 necessarily all of them, but most of them. Excuse me, I guess
11 she does appear as a vice president of all of them. And
12 Janice Crouch doesn't appear at all.

13 A No, but she was eventually elected vice president.

14 Q Eventually?

15 A Yes.

16 Q But this then leads me back to May of 1983 when
17 Janice was added in the first place to the board of Trinity
18 Broadcasting Network.

19 A Yes.

20 Q Apparently, her addition was not accompanied by a
21 concurrent election to the office of vice president.

22 A No, it wasn't.

23 Q And so that if Paul Crouch died the next day in a
24 plane crash, the vice president, who was Jane Duff, would that
25 have made her president?

1 A It would have made Jane -- Well, Jane would have had
2 all of the rights and responsibilities of president, yes.

3 Q The rights and responsibilities, including those
4 rights that were written into the bylaws to protect the person
5 who held the office of president?

6 A Yes.

7 Q And that she continued to have -- that that was a
8 possibility until such time as Janice Crouch was made vice
9 president?

10 A Yeah. And I -- Yes, that's true.

11 Q So the addition of Janice Crouch in May of 1983 was
12 deemed to be -- or was seen as some kind of protection for the
13 Crouch Family?

14 A Yes, it was. To recognize her life effort to the the
15 corporation and the fact that she had put all of her life into
16 it up until that time.

17 Q Now, in terms of protecting her or according her such
18 recognition, there was nothing that prevented you, in the
19 event Paul Crouch died, from adding Janice Crouch to the
20 board, was there?

21 A No, we could have added anybody we wanted, up to 10
22 people.

23 Q Do you have any recollection as to when it was that
24 Janice Crouch gave Paul irrevocable proxy to vote for -- to
25 vote her, to vote her vote relative to Trinity Broadcasting

1 Network?

2 A It would have been sometime prior to this 1984
3 meeting.

4 Q Well, you'll note that the proxy that we have is
5 undated.

6 A Yeah.

7 Q We don't know for certain when.

8 A She, she's given him several proxies. Those have
9 been renewed. There isn't just one. There have been, been
10 several.

11 Q You have a recollection, though, that the first proxy
12 that was given by Janice to Paul was sometime in the vicinity,
13 you know, approximately when Janice was voted on to the
14 Trinity Broadcasting Network board in the first place?

15 A Yes, it would have been in that, in that vicinity, I
16 believe.

17 Q Now, at the time Janice was added to the board of
18 Trinity Broadcasting Network, was there any concern about what
19 might happen to her in the event Paul died in terms of where
20 she was going to live?

21 A I don't remember that being discussed.

22 Q There was a time, was there not, when the, when the
23 house that the Crouches now live in was bought by the
24 corporation?

25 A No.

1 Q Never?

2 A No. What you're -- There is a house next door to the
3 house that they live that is used as a guest house, and that's
4 owned by the corporation. Crouches bought and paid for their,
5 their own house before they came to Trinity.

6 Q Wasn't the practical effect of adding Janice Crouch
7 to the board simply giving Paul Crouch two votes?

8 A That's, that is one of the effects.

9 Q And that was understood by both you and Jane to be
10 the practical effect when Janice was added?

11 A That's right.

12 Q And this is something that you and Jane wanted to
13 have happen?

14 A Yes.

15 Q But the idea was put to you initially by Paul?

16 A Yes, it was.

17 Q Now, why was it that Janice was added to the board of
18 Trinity Broadcasting Network on May 27, 1983, but she was not
19 added to the boards of the other Trinity-named corporations?
20 As, as you can see by looking at Mass Media Exhibit 70, the
21 second page, the first full paragraph states that Janice
22 Crouch, director of Trinity Broadcasting Network, was absent.
23 Now, the clear suggestion from that is that she was not a
24 director of any of the other corporations. Am I correct?

25 A That's, that's, that's true.

1 Q So why was she added to the network and she was not
2 added to the others at that -- in May of 1983?

3 A There was -- No one nominated her. There's no, no
4 consideration given to adding to the other, other
5 corporations. I don't know why. It never went through my
6 mind. Nobody proposed it, nobody discussed it.

7 Q Well, it seems that there was a great deal of
8 consideration given to protecting Paul Crouch's role, not only
9 for Trinity Broadcasting Network, but as president of Arizona,
10 Oklahoma City, Florida --

11 A That's true.

12 Q -- etcetera. Apparently, there was some
13 consideration given to protecting Paul Crouch even further by
14 adding his wife to the board of Trinity Broadcasting Network
15 in May of 1983, as we see here.

16 A That's true.

17 Q Now, what I don't understand, and perhaps you can
18 explain, perhaps you can't, is why those same considerations
19 protecting Paul Crouch would not have existed relative to the
20 other Trinity corporations in May of 1983.

21 A Probably because I didn't suggest it, and perhaps I
22 should have.

23 Q Well, not only you didn't suggest it, but apparently
24 Paul Crouch didn't suggest it either.

25 A I don't recall that he did suggest it.

1 Q Well, I mean, adding Janice to the board in the first
2 place was as a result of Paul's suggestion, correct?

3 A That's right. That's right.

4 Q When Janice Crouch was added to the board of Trinity
5 Broadcasting Network, wasn't it with the understanding that
6 generally she would not be attending board meetings?

7 A No, that was not, not my understanding. I thought
8 that she would be attending. And then it turned out that she,
9 she just hasn't attended very many meetings.

10 Q Had you ever spoken with her beforehand to determine
11 whether or not she had any interest in becoming a director of
12 Trinity Broadcasting Network?

13 A Not, not per se about becoming a director, but I was
14 well aware that she had great interest in all of the affairs
15 of the, the corporation.

16 Q Well, that, that could very well be, but the focus of
17 my question is whether you had any discussions with her about
18 becoming a director and whether she had expressed any desire
19 to become a director.

20 A No. I assumed that if her husband was nominating her
21 that he knew that she wanted that position.

22 Q You never spoke with her about it, though?

23 A No, I didn't.

24 Q To this day, you've never spoken with her about it?

25 A About being a director?

1 Q Yes, sir.

2 A Yes, and she's told me she doesn't like business, the
3 business meetings.

4 Q Which is essentially what a director is supposed to
5 do, right? Attend the business meetings and vote?

6 A That's true.

7 JUDGE CHACHKIN: We'll take a luncheon recess till
8 1:45 today.

9 (Whereupon, at 12:30 p.m., a luncheon recess was
10 taken, and the hearing reconvened at 1:45 p.m.)
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A F T E R N O O N S E S S I O N

1 JUDGE CHACHKIN: Back on the record. Mr. Shook.

2 BY MR. SHOOK:

3 Q Mr. Juggert, I'd like you to look at Mass Media
4 Exhibit 57. I'm only going to have a question or two on that,
5 then we can move on.
6

7 MR. EMMONS: It's in Volume I, Mr. Juggert.

8 MR. JUGGERT: Yes, I have turned to the page.

9 BY MR. SHOOK:

10 Q The minutes reflect that all directors were present.
11 I, I take it that means yourself, Paul Crouch, and Jane Duff?

12 A Yes.

13 Q There's no indication here, one way or the other,
14 whether Janice Crouch was present. Do you have any
15 recollection as to whether or not she was there?

16 A I don't recall.

17 Q Now, you keep the minutes for Trinity Broadcasting
18 Network, correct?

19 A Trinity Christian Center of Santa Ana.

20 Q Right. When I used Trinity Broadcasting Network,
21 I'll, I'll try to keep it straight from the timer period,
22 because what was it, the late eighties that it changed the
23 name to Trinity Christian Center of Santa Ana?

24 A That, that's correct.

25 Q All right. At this point in time, try to focus in

1 terms of the time, and I didn't preface my question with that
2 but I'm still in the 1983 period.

3 A Yes.

4 Q In 1983 and earlier, you had been keeping the Trinity
5 Broadcasting Network minutes, hadn't you?

6 A Yes, that's correct.

7 Q Now, were you the only person who kept a set of
8 minutes or were there other people who would also keep a set
9 of minutes?

10 A I don't know about the '83. I do recall that, that
11 became an issue at some time because the Trinity finance
12 department wanted to have copies and the president's office
13 also wanted to have copies of the minutes. And so -- And I'm
14 not sure just when that started, but I'm confident they have
15 up-to-date copies now.

16 Q You made a copy of the minutes for both of those
17 places?

18 A Yes. Yes.

19 Q Now, would you ever be sending minutes to FCC
20 counsel, specifically Mr. May or Mr. Dunne, in Washington,
21 D.C.?

22 A The only minutes that I can think of in that nature
23 would be the annual minutes that would have -- Maybe once or
24 twice I sent the annual minutes directly to FCC counsel, and I
25 anticipated that in other instances they would be sent by the

1 president's office.

2 Q Was there any particular reason why annual -- the
3 meetings -- Excuse me. Was there any particular reason why
4 the minutes of annual meetings would be sent to FCC counsel as
5 opposed to special meetings?

6 A Well, generally, the FCC counsel was present at the
7 annual meeting, whereas he was not at the other meetings, and
8 he would have a recollection as to what was said.

9 Q So the minutes were sent to FCC counsel, in part, for
10 review?

11 A For review, particularly if he had made some comments
12 about FCC matters, which were frequent.

13 Q Were minutes sent to FCC counsel in order to alert
14 FCC counsel as to the deletion or addition of officers and
15 directors to the various Trinity corporations?

16 A That wouldn't have passed through my mind, but that
17 certainly would have, would have alerted them to it because
18 they're always listed.

19 Q But you personally were not in the practice of
20 sending minutes to FCC counsel when a board member or an
21 officer was added or deleted?

22 A Generally, generally not.

23 Q Generally not, but there were occasions when you did
24 so?

25 A I have to confess that I do have recollection of Jane

1 Duff mentioning to me we need to alert Colby May to the fact
2 there's been a board change. I think you're supposed to do
3 that within 30 days. And quite often, Jane takes that upon
4 herself or call me and say did you do it. And if I haven't,
5 she'll see to it that it's, it's accomplished.

6 Q And would that be accomplished by her obtaining the
7 copy of the appropriate minutes from you or would she have her
8 own set of minutes from which she could --

9 A If it's just day-to-day minutes, not the annual
10 meeting, those would generally be in my possession. And I
11 quite often will just send them over to her to send on to FCC
12 counsel.

13 Q Well, for example, then the minutes such as Mass
14 Media Exhibit 57, those would be minutes that you would have
15 in your office but that would not necessarily be kept at
16 Trinity?

17 A At least contemporaneously.

18 Q At some subsequent time?

19 A They, they, they would have, have copies now.

20 Q And it would not have been your practice in 1983 to
21 have sent a copy of the minutes such as Mass Media Exhibit 57
22 to FCC counsel?

23 A No, not automatically.

24 Q Do you recall there being a time when such minutes
25 were sent to FCC counsel?

1 A These minutes?

2 Q Yes, sir.

3 A No, I don't know if they were.

4 Q Now, I'd like you to turn to Mass Media Exhibit 72,
5 which is in the second volume.

6 A Yes.

7 Q Turn, if you will, to the second page.

8 A Okay.

9 Q Do you recall having any discussion with FCC counsel
10 as to what certifications or what responses, rather, should be
11 given to Questions 1 through 4 under "Certification of
12 Preferences"?

13 A No.

14 Q Were you aware that such a certification, the
15 Certification of Preferences that is noted here, was being
16 made to the FCC?

17 A No.

18 Q Now, you would have occasion to review financial
19 statements for Trinity Broadcasting Network and related or
20 affiliated companies, would you not?

21 A Yes.

22 Q And you would do so generally in the context of the
23 annual meeting of the boards of directors of Trinity and
24 affiliated corporations?

25 A They would be -- There would be interim statements

1 that would be given to me periodically, as well.

2 Q In other words, when a statement was completed by the
3 auditing firm, it would be made available for the board to
4 review?

5 A That's, that's true. They're usually about a year
6 behind.

7 Q There would also be unaudited statements made
8 available for the board to review?

9 A The accounting department of Trinity would
10 periodically prepare unaudited statements, but those were
11 primarily for Trinity Christian Center.

12 Q The financial statements that I'm concerned with now
13 would include Trinity Broadcasting Network plus Trinity of
14 Arizona, Trinity of Oklahoma City, etcetera, a financial
15 statement such as we saw in Mass Media Exhibit 3, just to give
16 you a starting point. And if you want, just -- you can turn
17 back to that and take a look. It's in the first volume.

18 A Can I put this one away?

19 Q You may as well keep it, because we're going to be
20 going to it.

21 A Yes.

22 Q Now, Mass Media Exhibit 3, would that have been an
23 audited or an unaudited, audited or unaudited financial
24 statement? Or is there any way of telling --

25 A Well, you can't tell.

1 Q Did you have -- Did you ever question anyone as to
2 why entities either were or were not included in a financial
3 statement for Trinity Broadcasting Network? In other words,
4 with respect to Exhibit 3, for example, did you have occasion
5 to question anyone as to why the various Trinity entities are
6 all listed in the same financial statement?

7 A No, I didn't.

8 Q Did you have any problem or concern with the
9 companies that are noted in Mass Media Exhibit 3 appearing on
10 the financial statement that you have?

11 A No, not as I recall. Generally, there were
12 individual statements that were released periodically for
13 these corporations as well.

14 Q Now, I'd like you to turn to Mass Media Exhibit 50,
15 and the pages that I want you to just scan briefly are
16 pages 18 through 21. I'm not going to ask you questions about
17 the numbers.

18 A Yes, I've got, I've got that.

19 Q All right. You'll notice that -- First of all,
20 you'll notice that this is the financial statement that was
21 prepared by Trinity's accountants. If you go back to the
22 first page, you can see that, and it will tell you what period
23 of time that it covers.

24 A Yes.

25 Q So I guess a different arrangement is 17-months

1 period, but that's what we have here. And if you look at the
2 companies that are listed, you see that, by and large, they
3 track the companies that are listed in the financial statement
4 that we have looked at previously. That is, Mass Media
5 Exhibit 3. You'll see there's the network, there's Arizona,
6 there's Denver, Florida, Hawaii, Oklahoma, Seattle, and Texas.

7 A Yes.

8 Q However, in the case of Mass Media Exhibit 50, there
9 is an addition that is for Translator TV, Inc. Do you see
10 that?

11 A Yes.

12 Q Now, did you have -- did you ever question anyone as
13 to why Translator TV, Inc., was included in this financial
14 statement?

15 A No, I didn't.

16 Q This was a financial statement, though, that you
17 personally had reviewed, did you not?

18 A I don't have any, any current recollection of
19 reviewing it.

20 Q If it were to state in the minutes of an annual
21 meeting for Trinity that the board reviewed the financial
22 statement, then you would have so reviewed it, wouldn't you?

23 A Yes, yes. I always review financial statements at
24 the annual meeting.

25 Q Now, with that in mind, did you ever question anyone

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1 as to why Translator TV, Inc., was included in this statement?

2 A No.

3 Q Did you have any problem or concern with Translator
4 TV, Inc., appearing on TBN's financial statement?

5 A I have no recollection of having any concern.

6 Q Now, I'd like you to turn to Mass Media Exhibit 51,
7 specifically focusing on the last paragraph.

8 A Yes.

9 Q Now, by the board considering, that would mean you --
10 also you were part of the board that considered the financial
11 statement?

12 A Yes.

13 Q Now, I'd like you next to turn to Mass Media
14 Exhibit 61, which is in the same volume. You'll see this is
15 the financial statement for the year ending December 31, 1982.
16 I'd like you to turn and briefly look through pages 20 through
17 23.

18 A Yes.

19 Q You'll see that Translator TV, Inc., has a column
20 that appears both with respect to assets and with respect to
21 liabilities and fund balance. Did you ever question anyone as
22 to why Translator TV, Inc., was included in the -- in Mass
23 Media Exhibit 61?

24 A Not that I recall.

25 Q Did you have any problem or concern with Translator

1 TV, Inc., appearing on TBN's financial statement, as, as
2 reflected in Mass Media Exhibit 61?

3 A I don't recall such a concern.

4 Q Please turn to Mass Media Exhibit 86, which is in the
5 second volume.

6 A I'm there.

7 Q You'll see this is a financial statement for Trinity
8 Broadcasting Network and subsidiary and affiliates for the
9 years ending December 31, 1983 and 1982. The pages that I
10 would like you to briefly look at are pages 26 through 29.

11 A Yes, I've looked at them.

12 Q And you'll notice that Translator TV, Inc., has a
13 column and that Community Education TV, Inc., has a column.
14 Do you see those?

15 A Yes, I do.

16 Q Now, did you question anyone as to why Translator TV,
17 Inc., and Community Education TV, Inc., were included in Mass
18 Media Exhibit 86?

19 A No, I didn't.

20 Q Did you have any problem or concern with Translator
21 TV, Inc., and Community Education TV, Inc., appearing in Mass
22 Media Exhibit 86?

23 A No. I assumed that this was all being done according
24 to common practices of accountants.

25 Q Now, at the time -- This would be in August -- Excuse

1 me. The statement that we have would have been in November of
2 1984. We know that you were not on the board of Translator
3 TV, Inc. Did you have any role in Community Educational
4 Television, Inc., at this time? And to help you with that, I
5 would refer you to Mass Media Exhibit 70, page 4.

6 A Yes, that reflects that I was a board member of
7 Community Educational Television.

8 Q All right. And you had no, you had no difficulty
9 with Community Educational TV having a column in the Trinity
10 financial statement?

11 A No. I left that to the accountants.

12 Q Well, if you'd had a problem with it as a board
13 member, you could have expressed that concern and had
14 something done about it, correct?

15 A That's -- Well, I could have at least asked that it
16 be done.

17 Q I'd like you to refer to Mass Media Exhibit 93, and
18 it's in the second volume.

19 A Yes.

20 Q You'll see that it's the audit report for Trinity
21 Broadcasting Network and subsidiary and affiliates for the
22 year ending December 31, 1984. The pages that I would want
23 you to focus on very briefly are pages 8 and 9.

24 A Okay.

25 Q You'll see that there is a column for Translator TV,

1 Inc., for -- on both pages.

2 A Yes, there is.

3 Q Did you ever question anyone as to why Translator TV,
4 Inc., was included in this statement?

5 A No.

6 Q Did you have any problem or concern with Translator
7 TV, Inc., appearing on this statement?

8 A Not that I recall.

9 Q Now, I also notice that there is no reference to
10 Community Educational TV on pages 8 and 9. And when you go to
11 page 4 of Mass Media Exhibit 93, in the second paragraph it
12 reflects that the audit report on Community Educational
13 Television has been covered by a separate report.

14 A Yes, I see that.

15 Q Now, do you have any recollection or explanation as
16 to why Community Educational TV was separated out but
17 Translator TV was not?

18 A There was -- At one point in time, it may have been
19 1984, but Community Educational TV developed its own
20 accounting department. That's the only explanation I can
21 give.

22 Q Now, was its own accounting department physically
23 located in the Trinity offices in California or was it located
24 someplace else?

25 A I'm not sure where it was, but it was physically

1 | located in Houston, Texas, at one point and has continued to
2 | be there. And I'm not sure when that began.

3 | Q Was Houston the first location for such a department
4 | or did it move because the first station that we're aware of
5 | for Community Education Television was Harlingen and the
6 | second one was Beaumont.

7 | A I believe that, that the only -- that was big enough
8 | for the, the, the accounting department was in Houston and it
9 | didn't start until Houston came on board.

10 | Q And is that the only explanation that you can recall
11 | or that you have for there being a separate report for
12 | Community Educational Television?

13 | A That's the only explanation that I could conceive of
14 | now.

15 | Q Next, I'd like you to turn to Mass Media Exhibit 110.
16 | It's in the same volume. This is the audit report for Trinity
17 | Broadcasting Network and subsidiary and affiliates for the
18 | year ending December 31, 1985.

19 | A Yes, I have that report.

20 | Q And the pages I would like you to turn to are pages 8
21 | and 9.

22 | A Yes, I've seen this.

23 | Q You see that there are columns for Translator TV on
24 | both of those pages?

25 | A Yes, I do.

1 Q Did you ever question anyone as to why Translator TV,
2 Inc., was included in Mass Media Exhibit 110?

3 A Not that I can recall.

4 Q Did you have any problem or concern with Translator
5 TV, Inc., appearing in Mass Media Exhibit 110?

6 A I don't remember any such concern.

7 Q Now I would ask you to turn to a new volume,
8 Volume III. Exhibit 156.

9 A Yes.

10 Q It's the financial statement for Trinity Broadcasting
11 Network and subsidiary and affiliates for the year ending
12 December 31, 1986.

13 A Yes.

14 Q Pages 8 and 9.

15 A Yes.

16 Q And you see that Translator TV, Inc., has a column on
17 both pages?

18 A I do.

19 Q Did you ever question anyone as to why Translator TV,
20 Inc., was included in Mass Media Exhibit 156?

21 A No.

22 Q Did you have any problem or concern with Translator
23 TV, Inc., appearing on the TBN financial statement? That is,
24 Mass Media Exhibit 156.

25 A Not that I recall.

1 Q I'm going to ask you to look at Volume IV,
2 specifically Exhibit 211.

3 A I'm there.

4 Q This is the financial statement for Trinity
5 Broadcasting Network, Inc., and subsidiary and affiliates for
6 the year ending December 31, 1987. Do you see that?

7 A Yes.

8 Q The pages that I would like you to look at, page 9
9 through 18, and you don't have to study them. It's simply a
10 matter of familiarizing yourself with what entities are listed
11 there.

12 A Yes, I see them.

13 Q And you see that National Minority TV has a column?

14 A Yes.

15 Q Did you question anyone as to why National Minority
16 TV was included in Mass Media Exhibit 211?

17 A No.

18 Q Did you have any problem or concern with National
19 Minority TV appearing in Mass Media Exhibit 211?

20 A Not that I recall.

21 Q Are you aware of any process by which Trinity
22 Broadcasting Network, now Trinity Christian Center of Santa
23 Ana, determines whether it will file a new or major change
24 low-power television station application?

25 A No.

1 Q Are you aware of any process by which National
2 Minority TV determines whether it will file a new or major
3 change application for a low-power television station?

4 A No.

5 Q Are you involved in any in the preparation or editing
6 of TBN's monthly "Praise the Lord" newsletter?

7 A I think I've looked at perhaps two, maybe three of
8 those for -- when there's been some concern that defamatory or
9 statements may be included or invasion of privacy.

10 Q Now, how did it come about that you would have looked
11 at those newsletters? Would Paul Crouch have sent one to you
12 and said I'm concerned about the possibility of defamation,
13 please look at this and tell me whether or not it's okay?

14 A Well, I would have received a draft of, of his
15 article, he has the lead article in every one, and asked me am
16 I defaming anybody? is this really untoward? do you think this
17 is something I should, should cut out?

18 Q This was a very once-in-a-while occurrence or you --
19 in your reference to two or three times, you're talking about
20 actually sending something back with your changes?

21 A Or sitting down with me in a meeting, saying here's
22 my tentative draft, what do you think?

23 Q I, I just want to make sure I understand your answer.
24 Is it that there were only two or three occasions when you
25 actually sat down with a draft and went over it and determined

1 | whether or not it was proper?

2 | A That's true.

3 | Q Were there any other occasions when you would have
4 | reviewed or edited any part of the TBN newsletter?

5 | A The only other occasion I can think of is one other
6 | occasion when there were announcements regarding charitable
7 | gifts, inviting people to make charitable gifts to Trinity. I
8 | think it was run by me see if it was correct and proper.

9 | Q Do you receive the monthly newsletter?

10 | A Yes, I do.

11 | Q Do you read it?

12 | A I hate to admit it but I don't read it that -- I
13 | don't read it every time.

14 | Q You do read it some of the times, though?

15 | A I read it very -- Yes. Probably more often not than
16 | I do.

17 | Q Okay, more often than not you don't read it?

18 | A More often than not I don't read it.

19 | Q But there are many newsletters that you have read?

20 | A That's correct. Particularly if my picture is in
21 | there.

22 | Q Would you have looked at the -- Would it have been
23 | your practice to look at the newsletter in connection with the
24 | praiseathons that Trinity runs now twice a year and apparently
25 | earlier on ran once a year?

1 A No more so than any other issue of that newsletter.

2 Q Are you involved personally in praiseathon
3 activities?

4 A No.

5 Q Even though you're a director of the network, you
6 don't get involved in that activity?

7 A I don't get on the -- on TV and jump around, no.

8 Q Do you do any behind-the-scenes work?

9 A No.

10 Q You do recognize, though, that the -- one of the
11 purposes of the newsletter is to solicit money for various
12 Trinity projects?

13 A That's correct.

14 Q In the course of that solicitation, you do make some
15 effort, do you not, to ensure that whatever solicitations are
16 made are, are accurate?

17 A That's, that's true.

18 Q Now, I'd like you to refer to Mass Media Exhibit 25,
19 which appears in the first volume.

20 A Okay.

21 Q Now, basically what I'd like you to focus on is just
22 the first page. You don't have to, you don't have to look at
23 pages 2, 3, or 4.

24 A My copy is somewhat faint.

25 Q Well --